

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

YELLOW CORPORATION, *et al.*,<sup>1</sup>

Debtors.

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)  
) Chapter 11  
)  
) Case No. 23-11069 (CTG)  
)  
) (Jointly Administered)  
)  
) **Re: Docket No. 391**

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' MOTION FOR ENTRY  
OF AN ORDER (I) AUTHORIZING AND APPROVING PROCEDURES TO  
REJECT EXECUTORY CONTRACTS AND UNEXPIRED LEASES  
AND (II) GRANTING RELATED RELIEF**

The undersigned hereby certifies that:

1. On August 31, 2023, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Debtors’ Motion for Entry of an Order (I) Authorizing and Approving Procedures to Reject Executory Contracts and Unexpired Leases and (II) Granting Related Relief* (the “Motion”) [Docket No. 391].

2. The deadline to respond to the Motion was on September 8, 2023 at 4:00 p.m. Eastern Time (the “Objection Deadline”).

3. The Debtors received informal comments to the Motion from (a) the Office of the United States Trustee and (b) Edinburgh Logistics and Finlayson Logistics, and filed objections or reservations of rights from (c) PACCAR [Docket No. 413], (d) East West Bank [Docket No. 430], (e) Valley National Bank [Docket No. 432], and (f) Wintrust Commercial Finance [Docket No. 527] (the “Responding Parties”).

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

4. The Debtors circulated a revised proposal form of order to the Responding Parties and the following parties: counsel to the Official Committee of Unsecured Creditors, the Junior DIP Lender, the B-2 Lenders, the ABL Agent, the United States Department of the Treasury, and the UST Tranche A Agent and UST Tranche B Agent (collectively, with the Responding Parties, the “Reviewing Parties”).

5. Attached hereto as Exhibit A is a revised proposed form of order (the “Revised Proposed Order”) that has been circulated to the Reviewing Parties, which do not object to entry of the Revised Proposed Order. Attached hereto as Exhibit B is a redline of the Revised Proposed Order showing changes against the order filed with the Motion.

6. Accordingly, the Debtors respectfully request entry of the Revised Proposed Order at the Court’s earliest convenience.

Dated: September 13, 2023  
Wilmington, Delaware

/s/ Laura Davis Jones

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